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Of Attorneys for Intervener-Plaintiff AMA Coalition for Justice and Police Reform

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

Case No. 3:12-cv-02265-SI

UNITED STATES OF AMERICA

Plaintiff,

v.

PLAINTIFF AMA COALITION'S
MOTION TO INTERVENE

CITY OF PORTLAND

Oral Argument Requested

Defendant.

The Albina Ministerial Alliance Coalition for Justice and Police Reform ("AMA Coalition"), moves to intervene in this action as a plaintiff as a matter of right under Fed. R. Civ. P. 24(a). Alternatively, the AMA Coalition moves to intervene permissively as a plaintiff under

Fed. R. Civ. P. 24(b). This motion is supported by the attached Complaint in Intervention, Memorandum in Support, Declaration of Dr. LeRoy Haynes, Jr. and accompanying exhibits.

Pursuant to Local Rule 7-1, counsel for Intervener-Plaintiff has conferred with counsel for Plaintiff United States of America and Defendant City of Portland – both parties took no position on this motion. As such, the parties were unable to resolve the dispute.

WHEREFORE, the AMA Coalition prays that the Court grant leave to intervene in this action and that its Complaint in Intervention be filed.

DATED: January 8, 2012

Respectfully Submitted,

s/ J. Ashlee Albies
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Of Attorneys for the AMA Coalition